

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America)
v.)
) Case No. 1:22-mj-496
JEFFREY TYLER WATSON)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 12, 2021 to August 7, 2022 in the county of Clinton in the
Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2251(a) & (e)	Sexual Exploitation of Children

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

D. B. Lasky

Complainant's signature

Daniel Kilbourne, SA FBI

Printed name and title

Sworn to before me and signed in my presence.
via FaceTime video

Date: Aug 18, 2022

City and state: Cincinnati, Ohio

**Karen L. Litkovitz
United States Magistrate Judge**



AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Daniel R. Kilbourne, a special agent with the Federal Bureau of Investigation (FBI), being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I have been employed as a special agent with the FBI since 2008 and am currently assigned to the violent crime squad in the Cincinnati FBI office. In my position I am responsible for investigations of violations of law involving various violent crimes to include crimes against children, drug trafficking, violent criminal acts, and human trafficking.
2. During my career as a special agent, I have participated in various investigations involving computer-related offenses and executed numerous search warrants to include those involving searches and seizures of computers, computer equipment, software, and electronically stored information. I have received both formal and informal training in the detection and investigation of computer-related offenses. As part of my duties as a special agent, I investigate criminal violations relating to child exploitation and child pornography including the illegal distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2252(a) and 2252A.
3. As a special agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.
4. Along with other agents and officers of the Federal Bureau of Investigation and other law enforcement agencies, I am currently involved in an investigation of the distribution, production and possession of child pornography by JEFFREY TYLER WATSON

(hereinafter referred to as "WATSON") and others. This Affidavit is submitted in support of a criminal complaint.

5. As part of the investigation, I have reviewed documentation, reports and other evidence provided by and discussed information with other officers involved in the investigation. For purposes of this Affidavit, I have not distinguished between information of which I have direct knowledge and that of which I have hearsay knowledge.
6. This Affidavit does not contain every fact known to the investigation, but only those deemed necessary to demonstrate sufficient probable cause to support the charge alleged in the complaint.

BACKGROUND OF INVESTIGATION

7. On or about August 10th 2022, FBI in Syracuse, New York executed a search warrant of 915 James St, Apt B16, Syracuse, NY 13203, the residence of Benjamin Munson. During this search, electronic items were seized.
8. On August 17, 2022 digital forensic copies of a TCL Android mobile phone and associated SD card seized pursuant to the search warrant were examined. Seven videos in were observed in a folder directory listed as "...personal/jeff." The seven videos depicted the sexual abuse of an approximately [REDACTED] by an adult male.
9. Further review of the videos showed items within the videos that potentially identified the victim, the adult male subject, and the location.
 - a. The adult male subject referred to the victim as [REDACTED].
 - b. A full face shot of the minor victim and a partial face shot of the male subject, were captured from the video – as described in paragraph 23(f).
 - c. A Cincinnati Bengals football team flag was present in one video.

- d. A late model red/burgundy Dodge Caravan bearing an Ohio license plate with partial plate number of 437 was also observed in one of the videos.
- 10. On August 17th 2022 FBI in Syracuse contacted your affiant to relay the above information.
- 11. Based on the description of the items found during the review of the TCL Android phone and SD card, specifically the directory name of “jeff” and the mention of a child’s name [REDACTED], your affiant reviewed the following information, previously reported to the FBI in Cincinnati.
- 12. On or about July 19th, 2022 your affiant telephonically interviewed Dori Shidaker, a caseworker for Clinton County Child Services (CCCS).
- 13. Shidaker reported that Dan and Darlene Watson, residential address 1322 Dakin Chapel Road, Sabina, Ohio had proactively taken custody of [REDACTED] from their son WATSON. WATSON lives in a camper on the same property located at 1322 Dakin Chapel Road. Shidaker was familiar with the Watson family.
- 14. WATSON’s [REDACTED] were identified by Shidaker as being:
 - a. [REDACTED] (hereafter “MVA”).
 - b. [REDACTED].
- 15. Darlene Watson reported to CCCS that WATSON had claimed that MVA was being sexually abused by someone, but provided no further information. Shidaker told your affiant that MVA was considered to be a well-adjusted child.
- 16. Darlene reported to CCCS that since she and Dan Watson were not believing WATSON about the abuse, that WATSON showed them a video of child pornography on his cell

phone. WATSON claimed that the video showed MVA, however Darlene and Dan reported that the child in the video was not [REDACTED].

17. WATSON additionally sent this video to Darlene and Dan Watson via text message. When Darlene and Dan Watson traveled to the CCCS offices, they showed the video from WATSON to Shidaker, who also verified the child was not MVA.
18. Shidaker made a recording of the video, and on July 19th 2022 your affiant traveled to the CCCS offices and reviewed the video. The video was found to be consistent with child pornography.
19. Shidaker provided the following identifiers for WATSON:
 - a. Jeffery Watson
 - b. DOB XX/XX/1985
 - c. SSAN XXX-XX-1184.
20. FBI in Syracuse sent your affiant copies of the items described in paragraph 9 of this affidavit. The identification card photo retrieved from the Ohio Law Enforcement Gateway for WASTON with DOB XX/XX/1985 and SSAN XXX-XX-1184 was compared to the partial face screenshot obtained from one of the child pornographic videos seized from Munson's residence, and was found to match.
21. Review of the Facebook profiles of Dan and Darlene Watson showed that the minor child observed in the videos, and whose face was observed as described in paragraph 9, was physically similar to MVA.
22. A check of the Accurint database showed that Dan Watson previously owned a 2008 Burgundy Dodge Caravan and it was registered to 1322 Dakin Chapel Road, Sabina,

Ohio. The Ohio license plate for this vehicle was HHF3437. This matches the description of the vehicle and partial license plate as described above.

23. Your affiant reviewed the 7 videos¹ that were recovered from the TCL Android cell phone and SD Card seized from Munson's residence, and found them to be consistent with child pornography. The following is a description of 3 of these videos.

a. **1_5154717541322457788.mp4** – an approximately 2 minute 32 second video. In this video, [REDACTED]

[REDACTED] An adult male voice can be heard, and the adult male [REDACTED]

[REDACTED] [REDACTED] At approximately the 4 second mark, a pink stuffed animal is observed that appears to be a fish. The metadata associated with the video indicates it was created on May 7, 2022.

b. **1_5154717541322458005.mp4** – an approximately 3 minute 51 second long video.

[REDACTED]
[REDACTED]. [REDACTED]
[REDACTED]

[REDACTED] The male is speaking to what appears to be another person on the phone, and states "*You'll understand when you see this beauty. This is gonna be a good one. I had a bunch of 'em that you can't really see, 'cause I couldn't hold the phone at the same time.*" The adult male then begins [REDACTED]

[REDACTED] At approximately the 1 minute 40 second mark a light blue bed frame

¹ One of the 7 videos appears to be a duplicate.

can be observed. The metadata associated with the video indicates it was created on April 6, 2022

c. **1_5154717541322458020.mp4** – an approximately 41 second long video. [REDACTED]

[REDACTED]
[REDACTED] At the 30 second point, the adult male asks [REDACTED]

[REDACTED] if the pizza is here. The metadata associated with the video indicates it was created on June 12, 2021

d. **1_5154717541322457723.mp4** - An approximately 43 second video. [REDACTED]

[REDACTED]
[REDACTED] The metadata associated with the video indicates it was created on August 7th, 2022.

e. **1_5154717541322457759.mp4** - An approximately 54 second video. [REDACTED]

[REDACTED]
[REDACTED] The metadata associated with the video indicates it was created on August 7th, 2022.

f. **1_5154717541322457761.mp4** - An approximately 5 minute 48 second video. [REDACTED]

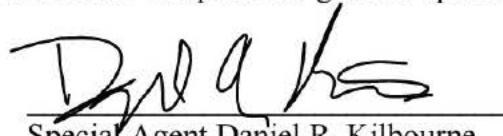
[REDACTED]
[REDACTED] In this video the adult male is wearing an "AC/DC" T-shirt, and a Cincinnati Bengals flag can be seen in the background. At the 3 minute 13 second mark, WATSON's face can partially be observed. The metadata associated with the video indicates it was created on August 7th, 2022.

24. Your affiant reviewed open source maps, and noted that the overhead view of 1322 Dakin Chapel Road in Sabina Ohio appeared to have a unique wooden fence along with a trampoline that match items observed in the video described under paragraph 23c above.

CONCLUSION

25. Based on the above information, I submit that there is probable cause to believe that WATSON produced child pornography in violation of 18 U.S.C. § 2251(a).

26. I therefore respectfully request that a criminal complaint be granted upon this affidavit.


Special Agent Daniel R. Kilbourne
Federal Bureau of Investigation

SUBSCRIBED and SWORN
before me this 18 of Aug 2022


Karen L. Litkovitz
United States Magistrate Judge

